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11 *Attorneys for Plaintiffs*
WALKME LTD. and WALKME INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

WALKME LTD., an Israeli company, and
WALKME INC., a Delaware corporation,

CASE NO. 4:23-cv-03991-JSW

**DECLARATION OF KIM KENNEDY IN
SUPPORT OF PLAINTIFFS' MOTION
TO RETAIN CONFIDENTIALITY**

DEMAND FOR JURY TRIAL

Hearing Date: July 19, 2024
Time: 9:00 AM
Courtroom: 5 – 2nd Floor
Judge: Jeffrey S. White

DECLARATION OF KIM KENNEDY

I, Kim Kennedy, hereby declare as follows:

1. I am a lawyer at the law firm Kobre & Kim LLP, and counsel to Plaintiffs WalkMe
 2 Ltd. and WalkMe Inc. (“Plaintiffs” or “WalkMe”) in the above-captioned action. I am an attorney
 3 duly licensed to practice in the State of California and before the District Court for the Northern
 4 District of California. I submit this declaration in support of WalkMe’s Motion to Retain
 5 Confidentiality. The matters stated in this declaration are based on my personal knowledge.

6 2. Attached as **Exhibit A** hereto is a true and correct copy of an email from John
 7 Lanham, dated April 18, 2024.

8 3. Attached as **Exhibit B** hereto is a true and correct copy of an email from Daniel
 9 Zaheer, dated April 23, 2024.

10 4. Counsel for WalkMe met and conferred with counsel for Defendants Whatfix, Inc.
 11 and Whatfix PL (together, “Whatfix”) on April 23, 2024.

12 5. During the parties’ meet and confer, WalkMe reiterated its request that Whatfix
 13 specify which particular redactions to the SAC and the exhibits thereto Whatfix was challenging.
 14 Whatfix identified several specific portions it believed should not have been redacted (¶¶ 52, 54,
 15 56, 57, 58, 68, 73, 74, and 83 of the SAC and item no. 123 of Exhibit A to the SAC) and stated that
 16 it was open to maintenance of WalkMe’s redaction of some other information, including the names
 17 of WalkMe customers.

18 6. At the conclusion of the parties’ meet and confer, WalkMe advised Whatfix that
 19 WalkMe would be filing revised redacted versions of the SAC and accompanying exhibits, and
 20 suggested that WalkMe’s revisions to its redactions would likely address most, and potentially all,
 21 of Whatfix’s concerns.

22 7. WalkMe asked Whatfix to review the revised redacted versions of the SAC and
 23 accompanying exhibits and to let WalkMe know if Whatfix had any remaining issues with
 24 WalkMe’s designations and Whatfix agreed to conduct that review.

25 8. Whatfix did not inform WalkMe that Whatfix had any remaining challenges with
 26 respect to WalkMe’s designations of its redactions to the SAC and exhibits thereto for more than

1 three weeks after WalkMe filed its revised redacted SAC and exhibits, nor did Whatfix request a
2 further meet and confer with WalkMe.

3 9. Given the absence of any further comment from Whatfix after WalkMe filed its
4 revised redacted versions of the SAC and accompanying exhibits, counsel for WalkMe understood
5 that WalkMe's revised redactions had resolved all of the concerns raised by Whatfix and that the
6 dispute over redactions and confidentiality designations in the SAC had been resolved.

7 10. Attached as **Exhibit C** hereto is a true and correct copy of an email from Caroline
8 Pohl, dated May 22, 2024.

9 11. Attached as **Exhibit D** hereto is a true and correct copy of an email from Caroline
10 Pohl, dated May 28, 2024.

11 12. The parties met and conferred on May 31, 2024, but have been unable to resolve
12 this dispute.

13 13. Attached as **Exhibit E** hereto is a true and correct copy of an email from Caroline
14 Pohl, dated May 31, 2024.

15 14. Attached as **Exhibit F** hereto is a true and correct copy of the Declaration of Nir
16 Nahum in Support of WalkMe's Reply to Defendants' Opposition to Plaintiffs' Administrative
17 Motion for Leave to File Under Seal Portions of Plaintiffs' Second Amended Complaint, filed on
18 April 29, 2024 (ECF No. 112-1).

19 15. Attached as **Exhibit G** hereto is a true and correct copy of the Declaration of
20 Elizabeth Hoffman in Support of WalkMe's Reply to Defendants' Opposition to Plaintiffs'
21 Administrative Motion for Leave to File Under Seal Portions of Plaintiffs' Second Amended
22 Complaint, filed on April 29, 2024 (ECF No. 112-2).

23 I declare under penalty of perjury that the foregoing is true and correct.
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1 Executed on June 10, 2024.

KOBRE & KIM LLP

2 By: /s/ Kim Kennedy
3 Kim Kennedy

4 *Attorneys for Plaintiffs*
5 WALKME LTD. and WALKME INC.

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7 **ATTESTATION**

8 I, Daniel Zaheer, am the ECF user whose ID and password are being used to file the above
9 Declaration. In compliance with Civil L.R. 5-1 (i)(3), I hereby attest that Kim Kennedy has
10 concurred in the aforementioned filing.

11
12 /s/ Daniel Zaheer
13 Daniel Zaheer

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